

1 RENE L. VALLADARES
Federal Public Defender
2 Nevada State Bar No. 11479
RAQUEL LAZO
3 Assistant Federal Public Defender
Nevada State Bar No. 8540
4 411 E. Bonneville, Ste. 250
Las Vegas, Nevada 89101
5 (702) 388-6577/Phone
(702) 388-6261/Fax
6 Raquel_Lazo@fd.org

7 Attorney for Andrew Carson Irvine
8

9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,
12
13 Plaintiff,
14 v.
15 ANDREW CARSON IRVINE,
16 Defendant.

Case No. 2:08-CR-340-GMN-LRL

**STIPULATION TO CONTINUE
REVOCATION HEARING**
(Second Request)

17 IT IS HEREBY STIPULATED AND AGREED, by and between Christopher Chiou,
18 Acting United States Attorney, and Kenneth Nicholas Portz, Assistant United States Attorney,
19 counsel for the United States of America, and Rene L. Valladares, Federal Public Defender,
20 and Raquel Lazo, Assistant Federal Public Defender, counsel for Andrew Carson Irvine, that
21 the Revocation Hearing currently scheduled on October 27, 2021 at 10:00 am, be vacated and
22 continued to a date and time convenient to the Court, but no sooner than twenty-one (21) days.

23 This Stipulation is entered into for the following reasons:

24 1. Since the last requested continuance, defense counsel was able to meet with
25 Mr. Irvine. Additional time is needed to further confer with Mr. Irvine regarding the alleged
26 violations.

2. Defense counsel requires additional time to further investigate the alleged violations. The requested time will also permit the parties time to attempt to negotiate a potential resolution.

3. Government counsel is out of the jurisdiction during the week of November 8, 2021. The parties are available during the week of November 15, 2021.

4. The defendant is out of custody and agrees with the need for the continuance.

5. The parties agree to the continuance.

This is the second request for a continuance of the revocation hearing.

DATED this 21st day of October, 2021.

RENE L. VALLADARES
Federal Public Defender

CHRISTOPHER CHIOU
Acting United States Attorney

/s/ Raquel Lazo
By _____
RAQUEL LAZO
Assistant Federal Public Defender

/s/ Kenneth Nicholas Portz
By _____
KENNETH NICHOLAS PORTZ
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 ANDREW CARSON IRVINE,

7 Defendant.
8

Case No. 2:08-CR-340-GMN-LRL

ORDER

9
10 IT IS THEREFORE ORDERED that the revocation hearing currently scheduled for
11 Wednesday, October 27, 2021 at 10:00 a.m., be vacated and continued to November 17, 2021
12 at the hour of 10:00 a.m.

13 DATED this 21 day of October, 2021.

14
15 
16 UNITED STATES DISTRICT JUDGE
17
18
19
20
21
22
23
24
25
26